

EXHIBIT F

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GENIUS GROUP LIMITED,

Petitioner,

v.

LZG INTERNATIONAL, INC.,
MICHAEL THOMAS MOE and
PETER RITZ,

Respondents,

and

VSTOCK TRANSFER, LLC,

Nominal Respondent.

Case No. 1:24-cv-08464-MKV

SHAWN CAREY, MSS CAPITAL, LLC,
HUNTS ROAD, LLC, ION 1 LLC,
BRICKELL CAPITAL SOLO 401K TRUST,
KAILEY LEWIS, EDWARD REINLE,
EMANUEL VALADAKIS and
ZITAH MCMILLAN-WARD,

Intervening Plaintiffs,

v.

MICHAEL MOE,
PETER B. RITZ,
LZG INTERNATIONAL, INC.,
ROGER HAMILTON and
GENIUS GROUP LIMITED,

Intervening Defendants.

NOTICE OF CROSS-MOTION TO STAY THE INTERVENORS' ACTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Genius Group Limited (“Genius”) hereby cross-moves this Court before the Honorable Mary Kay Vyskocil, at the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square New York, NY 10007, for an order to stay the action brought by Intervenor Shawn Carey, MSS Capital, LLC, Hunts Road, LLC, Ion 1 LLC, Brickell Capital Solo 401k Trust, Kailey Lewis, Edward Reinle, Emanuel Valadakis and Zitah Mcmillan-Ward, entitled *Shawn Carey et. al. v. Michael Moe et. al.*, Case No. 1:24-cv-07551 (S.D.N.Y., filed Oct. 4, 2024), pending final resolution of the International Chamber of Commerce arbitration proceeding by and among Genius, on the one hand, and LZG International, Inc., Michael Thomas Moe and Peter Ritz, on the other hand, and for such other and further relief as this Court may deem just and proper.

DATED: Jericho, New York
December 17, 2024

Respectfully submitted,

/s/ Christopher M. Basile
Christopher M. Basile, Esq.
Joseph F. Rose, Esq.
THE BASILE LAW FIRM P.C.
390 North Broadway, Suite 140
Jericho, NY 11753
Tel.: (516) 455-1500
Fax: (631) 498-0748
Email: chris@thebasilelawfirm.com
joe@thebasilelawfirm.com

Counsel for Petitioner Genius Group Limited